

1 Q. They are not producing revenue?

2 A. I can't answer that.

3 Q. So when it was turned over to network  
4 engineering, who did those functions, who supported  
5 them?

6 A. I don't know who it went over to. Our  
7 involvement was very limited afterwards. We needed to  
8 get circuits in there, we would extend them to a  
9 certain point, and then they would pick it up within  
10 their lab.

11 Q. If there was a network connectivity issue,  
12 would they use the comtrack system or one of the other  
13 steps?

14 A. I don't know what they would use in there.

15 Q. Did you ever get requests from the lab --

16 A. Yes.

17 Q. -- to assign a technician to do work over  
18 there?

19 A. Yes. We had to extend connectivity into the  
20 lab if it was out of the realm of the lab. If an  
21 outside circuit was -- a T 1 circuit or a phone line  
22 or something was coming into that area, we would  
23 extend it. If that area required some type of  
24 production network connection for a machine on the  
25 network, we would help with that. We would get it

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1 extended into there.

2 Q. So you would do the same type of things you  
3 did for other areas for the lab also?

4 A. Yes, we would base -- think of it this way,  
5 we would treat the lab as an end user, because at the  
6 end of the day when we installed that network  
7 connection, we can't be liable for what they are  
8 plugging in. All we can do is verify it's connected  
9 to the network.

10 Q. That's the same you do with any other  
11 department or division within CTI?

12 A. Yes.

13 Q. Now, the lab was testing new technology.

14 Did they have a bigger turnover of  
15 devices or equipment on their floor than any of the  
16 other divisions that you serviced?

17 A. I don't know.

18 MS. PONTOSKI: I object to this whole  
19 line of questioning. He clearly doesn't know what  
20 went on in the lab. He's not being produced on what  
21 went on in the labs.

22 MS. WALSH: I am investigating with  
23 him what he does know, because there's a number of  
24 documents that we were given that does reference it.

25 If you don't know, that's fine.

1 A. We extend connectivity as per the request.

2 That's basically it. I can tell you I know -- I have  
3 extended connectivity into there for circuit and  
4 network equipment.

5 Q. When your group did work for the lab, was  
6 there a particular technician who did -- who was  
7 assigned mostly to that, or was it randomly based on  
8 who was available?

9 A. I don't recall.

10 Q. Did there come a time when a position became  
11 available at the lab to support the technology there?

12 MS. PONTOSKI: Objection to the form  
13 of the question.

14 A. Yes.

15 Q. When was that?

16 A. When Carmelo left to go to engineering.

17 Q. What was the position created?

18 A. I don't know. It was an engineering position  
19 in the lab.

20 Q. Do you know what he did after he moved over  
21 to the lab position?

22 A. No.

23 Q. After he moved to the lab position, did he  
24 ever communicate with you with respect to the work he  
25 was doing there?

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1 A. Just whenever he needed connectivity extended  
2 to that extent. We had personal e-mails, sure, how  
3 are you doing, how are things. He was a good worker.  
4 I treat him like anybody else that respected me. And  
5 he always respected me.

6 (Saranello Deposition Exhibit Number  
7 4 was marked for identification.)

8 Q. For identification purposes what has been  
9 marked as Saranello 4 is a four-page document Bates  
10 stamped CTI 0000330 through 333.

11 A. Pretty nice review, I would say.

12 Q. You are a nice boss.

13 A. I hope he told you the same thing.

14 (Discussion held off the record.)

15 Q. Can you identify this document?

16 A. Yes.

17 Q. What is it?

18 A. Carmelo Millan's 2003 year end performance  
19 review.

20 Q. And did you prepare this?

21 A. Yes.

22 Q. And at the time you were an assistant vice  
23 president?

24 A. Yes.

25 Q. If you turn to page three of the document on

1 the overall performance summary?

2 A. Yes.

3 Q. Last sentence you say Carmelo has completed a  
4 total of 760 comtrack tasks for 2003?

5 A. Yes.

6 Q. Again, is that an average number of comtrack  
7 tasks to complete for a technician, or more or less  
8 than average?

9 A. It's a decent number on top of the projects  
10 and compliance he was doing, it was pretty good.

11 Q. You indicate, per his efforts you would like  
12 to see Carmelo promoted to associate technical  
13 analyst.

14 What is that position?

15 A. I don't recall, but it must have been the  
16 next step up from where he was.

17 Q. Is that -- was that title within your group?

18 A. I don't recall.

19 Q. Do you know if he was ever promoted to  
20 associate technical analyst?

21 A. I don't know.

22 Q. Under primary area for improvement, second  
23 thing you have is better understanding of data center  
24 build-outs.

25 What did you mean by that?

1 A. I don't recall.

2 Q. Section three on the second page, assessment  
3 of managerial factors, you have written in not  
4 applicable?

5 A. Yes.

6 Q. So he wasn't involved in any of those  
7 managerial tasks?

8 A. Managing people, no.

9 Q. The tasks listed there?

10 A. This is very vague. This section three, we  
11 are always told if you are not managing people this  
12 doesn't get filled out. As far as managing projects  
13 and certain areas, yes, he definitely did.

14 Q. Under key job responsibilities, you have  
15 listed as number three, maintain and address  
16 compliance issues for NISS.

17 What is NISS?

18 A. That was our name at the time, network  
19 integration site support.

20 Q. Other than what we already talked about  
21 regarding compliance issues, does that include  
22 anything else?

23 A. No, that's pretty much it.

24 Q. Number four says, SOE network implementation  
25 and support, what is SOE?

1 A. Standard operating environment.

2 Q. Could you explain what that is?

3 A. Pretty much the way that we deliver service  
4 to our clients is standard operating environment from  
5 the desktop to the server we have -- at that time it  
6 was SOE. We had the whole process and procedure thing  
7 in place. That's pretty much what SOE is.

8 Standard operating environment  
9 pertains to how machines connect to service, pretty  
10 much how their applications are not local to the  
11 server, which is hard to explain. But we use that  
12 term not only for its definition of what it actually  
13 was, which was a file server down here has all the  
14 applications on it, and then your machine is here.  
15 And when it connects to this machine, you don't have  
16 to have those applications locally loaded on there,  
17 it's getting it from the server. So that's what SOE  
18 means.

19 We used the SOE term to -- as our  
20 model of how we did our build-outs and how we  
21 controlled our environment. So if we merged with  
22 another company we would implement SOE. Pretty much  
23 everybody would gang together, the assistant  
24 administrators network people, integration, you know,  
25 project management team, and we would convert the new

1 business to an SOE network; which is everything from  
2 the logical meaning of what it is to our whole process  
3 of how we manage our environment.

4 Q. In terms of you identifying SOE network  
5 implementation and support as one of Mr. Millan's key  
6 job responsibilities, could you explain what that  
7 means?

8 A. Just that it was part of, you know, his task,  
9 to be part of SOE network implementation and support.  
10 That was one of his tasks.

11 Q. What did that mean?

12 A. Being a part of building SOE networks.

13 Q. Did Mr. Millan, after he moved to work at the  
14 lab, did he ever communicate to you that he was  
15 overworked?

16 A. I believe he sent me some e-mails saying he  
17 was, yes. He was working very hard, I remember him  
18 telling me. At that point he was not working for me,  
19 there was only so much that I could do to help him.

20 Q. Did he ever request you assist him in finding  
21 another position?

22 A. I believe he asked if I had any openings.

23 Q. What did you tell him?

24 A. I didn't have any at the time. I didn't know  
25 of any. I don't remember his exact question. I

1 remember him asking me if I know if anything opened  
2 up.

3 Q. If there was a position that was open for  
4 him, would you have considered hiring him back?

5 A. Probably. I can't answer that. I don't  
6 know. At that point I don't know.

7 (Saranello Deposition Exhibit Number  
8 5 was marked for identification.)

9 Q. I am going to give you a document marked as  
10 Exhibit 5, and for identification purposes it's a  
11 four-page document with Bates stamp numbers CTI  
12 00001476 through 1479.

13 I will ask if you can take a moment  
14 to look at that document.

15 A. Okay.

16 Q. Do you recognize what this is?

17 A. Yes.

18 Q. What is it?

19 A. It's an insurance questionnaire we used to  
20 have to fill out for - I believe I only did this  
21 once, because this was actually the role of the  
22 network control teams because they owned the actual  
23 equipment.

24 But we did it that year, I remember,  
25 and I think it was basically to show if a building

1 ever went away or we lost equipment or if it was  
2 stolen or whatever, this I believe was the value.

3 Q. I assume you are referring to a portion of  
4 this document that says the insurance questionnaire  
5 needs to be filled out by --

6 A. Yes.

7 Q. Before we get to that, what's this actual  
8 document that I gave you, can you identify what it is?

9 A. It's a request to fill out the insurance  
10 questionnaires.

11 Q. Is it an e-mail?

12 A. E-mail.

13 Q. That's what I want to get for the record. So  
14 it's an e-mail that was sent from you to Carmelo  
15 Millan?

16 A. Yes.

17 Q. It has a trail of --

18 A. Of my sites.

19 Q. Included in this is an e-mail that Carmelo  
20 Millan sent to Garfield Spence and copied you on, is  
21 that correct?

22 A. Yes.

23 Q. And with respect to the first portion of the  
24 part of the e-mail that Carmelo Millan sent, it says,  
25 Gary, the COB plan is basically finished, is that

1 correct?

2 A. Um-humm.

3 Q. Is it your understanding that when he's  
4 referencing the COB plan, it's the plan we discussed  
5 earlier that he was responsible for creating?

6 A. Yes.

7 Q. And this e-mail was sent -- the date on this  
8 e-mail was September 9th, 2003, is that correct?

9 A. Yes.

10 Q. Does that refresh your recollection with  
11 respect to the timing of when the COB was created?

12 A. No. It could have been that year, 2003.

13 Q. So this doesn't in any way refresh your  
14 recollection with regard to that?

15 A. Of when it was created? I don't understand.

16 Q. You indicated Carmelo Millan created the COB  
17 plan at some point?

18 A. Yes.

19 Q. You didn't remember when it was?

20 A. Not exactly, no.

21 Q. He wrote this e-mail on September 9th, 2003,  
22 telling Gary the COB plan is basically finished?

23 A. Yes.

24 Q. My question to you is does this in any way  
25 refresh your recollection?

1 A. When he finished it, yes, this says it, this  
2 is when he finished it.

3 Q. Okay.

4 A. When he started it, that's my point. This is  
5 me responding back with the insurance information for  
6 each site.

7 Q. When you say that, the attachments are  
8 attached to your e-mail?

9 A. Yes, Excel sheets and Word docs.

10 (Saranello Deposition Exhibit Number  
11 6 was marked for identification.)

12 Q. I am going to show you what was marked as  
13 Exhibit 6 and give you a minute to look at it.

14 For identification purposes I gave  
15 Mr. Saranello a two-page document with Bates stamp CTI  
16 00001484 through 1485.

17 A. Yes.

18 Q. Do you recognize this document?

19 A. Yes.

20 Q. What is it?

21 A. It's changing the structure of the way we had  
22 our manual to the way compliance was asking for it.

23 Q. Was this an e-mail sent from Carmelo Millan  
24 to you?

25 A. No.

1 Q. I'm sorry, from you to Carmelo Millan?

2 A. Yes.

3 Q. And you refer to someone called Patty.

4 Who is Patty?

5 A. Patty Scarda from compliance.

6 Q. It says, Patty was here this week and told me  
7 that converting our manual to the structure of the  
8 overall PCM is the next deliverable.

9 What is the overall PCM?

10 A. Patty had a document -- she supported our  
11 overall department, which was network integration at  
12 the time, I believe it was network integration, and we  
13 had our own PCM, and I guess network integration had  
14 their own PCM.

15 And she had a combined one, which  
16 was the overall PCM, which combined both groups, I  
17 guess, I don't know. But she had a certain structure,  
18 the way it was, and we had to conform to it. That was  
19 broken down by processes.

20 (Saranello Deposition Exhibit Number  
21 7 was marked for identification.)

22 Q. I am going to show you a document marked as  
23 Exhibit 7, and for identification purposes it's a  
24 two-page document Bates stamped CTI 00001490 through  
25 91.

1 Do you recognize this document?

2 A. Yes.

3 Q. What is it?

4 A. Updates.

5 Q. Is it an e-mail from you to Mr. Millan?

6 A. Yes.

7 Q. And is the date on that Friday, May 30th,

8 2003?

9 A. Yes.

10 Q. So what was the purpose of this e-mail?

11 A. Updates.

12 Q. Updates to the PCM?

13 A. Yes.

14 Q. Were you providing Mr. Millan with

15 information to be added to the manual?

16 A. Yes.

17 Q. Was that a typical way in which you would

18 communicate updates to the manual to Mr. Millan?

19 A. Early on, yes, when he was doing this.

20 Afterwards he took it upon himself to handle.

21 Q. Would this have been early on in the process

22 of the creation of the manual?

23 A. Yes, I believe so. But again, it could have

24 been something that I noticed wasn't in the manual,

25 and then I could have said, hey, these drawings should

1 be in there, let's add them.

2 And you can see these are diagrams.

3 Q. Where do you get those diagrams from?

4 A. They could be engineering diagrams, they  
5 could have been diagrams we created on our own.

6 Because I see both on here.

7 Q. As far as the time reporting system, was  
8 there a procedure for recording vacation time?

9 A. Same way you would record any of your work  
10 time.

11 Q. You would have to put it in and assign it to  
12 vacation time?

13 A. Yes, yourself.

14 Q. And same for sick time?

15 A. Yes.

16 Q. And personal days?

17 A. Yes.

18 Q. Any other reasons why you would input time  
19 that was nonwork related time?

20 A. Either nonwork or it was work related.

21 Nonproject and project, I guess.

22 Q. If you were training for something --

23 A. Training, yes.

24 Q. While Carmelo Millan worked for you or  
25 reported to you, did he undergo any training?

1 A. Off the top of my head, I can't answer that.

2 I am sure he did.

3 Q. Did any other technicians who reported to you  
4 undergo any training?

5 A. Yes, training is available.

6 Q. At the time Mr. Millan reported to you, what  
7 type of training was available for him to take?

8 A. Training is available on a large scale. You  
9 can take whatever training you are interested in.

10 Q. Is it required?

11 A. No. There are some mandatory human resource  
12 training courses.

13 Q. Were there any certifications required to do  
14 the job of a technician?

15 A. I would look for people with networking  
16 backgrounds and cabling certifications for  
17 infrastructure. ICND was something that I  
18 recommended, interconnecting Sisco network devices.

19 Q. Did all of the technicians who work for you  
20 have ICND certification?

21 A. Most.

22 Q. Some didn't?

23 A. Off the top of my head, I don't know if  
24 anyone doesn't go.

25 Q. Was it required for the job?

1 A. I don't know if that's a requirement for  
2 hiring, I don't know.

3 Q. Were any certifications required for that  
4 job?

5 A. I don't know. I don't know what the  
6 requirements are from an HR perspective.

7 Q. Did you make any efforts to find out what the  
8 requirements were?

9 A. No.

10 (Saranello Deposition Exhibit Number  
11 8 was marked for identification.)

12 Q. I am going to show you quite a bulky document  
13 marked as Exhibit 8. It's Bates stamped for  
14 identification purposes as CTI 00001262 through 1356.

15 I am just going to ask you to have a  
16 brief scan through this and ask if you recognize the  
17 document.

18 MS. PONTOSKI: Before we start, I  
19 object to this line of questioning. This has to do  
20 with maintenance of the system that he's not aware of.  
21 It's outside the scope.

22 If he wants to answer to the extent  
23 he knows.

24 Q. The only question is if you recognize the  
25 document.

1 A. Honestly, I have never used it.

2 Q. Do you recognize it?

3 A. I learned how to use project tracking and  
4 time reporting hands-on. I never used the guide;  
5 honestly, and also may have taken an on-line course.  
6 But I can't be sure.

7 Q. Did Mr. Millan speak to you with regard to  
8 his move to this new position at the lab?

9 MS. BOUCHARD: Objection to form.

10 A. I don't recall exactly what was said, but  
11 yes, we had conversations.

12 Q. Do you recall anything that was said?

13 A. No. I believe I recommended him to the  
14 position.

15 Q. You became aware the position was becoming  
16 available?

17 A. Yes. I believe so. I don't know exactly --  
18 I don't recall where it came from, but he was  
19 recommended.

20 Q. You recommended him?

21 A. I believe I did.

22 Q. Who did you recommend him to?

23 A. Could have been Paul Holder, I don't know, I  
24 don't remember.

25 Q. Did you make him aware the position was

1 available, or did he find out through some other  
2 means?

3 A. I don't recall.

4 Q. Was there anyone else from your group who was  
5 considered for the position?

6 A. I don't think so.

7 Q. Did anybody else in your group apply for the  
8 position?

9 A. I don't know.

10 Q. Back at the time you were supervising Mr.  
11 Millan how many technicians -- one technician would  
12 support approximately how many devices?

13 MS. PONTOSKI: Object to the form of  
14 the question.

15 A. I don't know.

16 Q. Did technicians get paid a higher salary if  
17 they had certifications?

18 A. I don't know.

19 Q. Were bonuses paid to technicians?

20 A. Yes.

21 Q. What was -- during the time Mr. Millan  
22 reported to you, how were bonuses calculated?

23 A. At that time I don't know. I wasn't handling  
24 it.

25 Q. Did you make any effort to find out before

1 the deposition today how bonuses were calculated?

2 A. No.

3 Q. Did you make any effort to find out before  
4 the deposition today if being certified would result  
5 in getting a higher salary?

6 A. No.

7 Q. Were there any technicians who were reporting  
8 to you who were working on an hourly basis?

9 MS. BOUCHARD: I object, hourly  
10 basis sort of has a legal connotation. If you could  
11 explain factually.

12 Q. Were any technicians who were reporting to  
13 you being paid hourly?

14 A. Yes.

15 Q. Which technicians?

16 A. Kenneth McMahon.

17 Q. Was he the only one?

18 A. That I know of, yes.

19 Q. Do you know why he was being paid on an  
20 hourly basis?

21 A. He was part-time.

22 Q. Was there a help desk that assisted with  
23 respect to assigning jobs to you or a particular  
24 group?

25 A. At times we would get trouble tickets from

1 the help desk.

2 Q. What was the help desk?

3 A. The help desk, they handled password resets,  
4 things that the support teams -- lower level, I guess,  
5 problems, such as password resets. I don't know. I  
6 don't know their function. It's low level function.

7 Q. What group or division was the help desk a  
8 part of?

9 A. I don't know.

10 Q. Were there help desks in either group or  
11 division, or just one help desk?

12 A. One help desk.

13 Q. Have you ever heard of the GTMS system?

14 A. I think it's global talent management system,  
15 I am not sure. GTMS may have been a Citi Bank  
16 ticketing system. But I never used it for tickets.

17 Q. Was it in operation at the time Mr. Millan  
18 reported to you?

19 A. I don't know. I don't think so, no. I know  
20 my team never used it during that time.

21 Q. Who was Meredith Prange?

22 A. I believe she was the head of engineering.

23 Q. Head of --

24 A. Engineering.

25 Q. Is that -- is that like the head of the

1 global engineering department?

2 A. Yes. Head of global engineering.

3 Q. Who did Gary Spence report to?

4 A. Douglas Johnston.

5 Q. What was his position, Douglas Johnston?

6 A. The area manager, I believe.

7 Q. Area manager for network --

8 A. Network integration.

9 MS. BOUCHARD: Is there a time  
10 period?

11 Q. At the time that Mr. Millan was reporting to  
12 you?

13 A. He was the head of network integration.

14 Q. What is he currently?

15 A. I don't know.

16 Q. Is he still working for CTI?

17 A. Yes.

18 Q. Did Mr. Millan get a bonus either of the two  
19 years he reported to you?

20 A. Yes.

21 Q. Did you determine what bonus he got?

22 A. Not the amount, no.

23 Q. Who determined that?

24 A. Gary Spence?

25 Q. Do you know what information he used to

1 determine that?

2 A. His performance review, I guess.

3 Q. When were the bonus numbers determined?

4 A. I don't know.

5 Q. Did you get a bonus at the time that Mr.

6 Millan reported to you?

7 A. Yes.

8 Q. When did you actually physically get your

9 bonus?

10 A. January, I believe.

11 Q. Did you get your number sometime prior to

12 that?

13 A. Yes.

14 Q. When was that?

15 A. I don't recall, it was January or December.

16 Q. What bonus did Mr. Millan get the first year

17 he reported to you --

18 A. No.

19 Q. -- do you know?

20 A. No.

21 Q. Did you make any effort to find that out?

22 A. No.

23 Q. What bonus did he get the second --

24 A. It was only two years he reported to me. I

25 believe he got a 5,000 dollar bonus.

1 Q. Did he ever get a raise when he reported to  
2 you?

3 A. Yes.

4 Q. Do you know what raise he got when he  
5 reported to you?

6 A. Last year I believe it was like 18 percent  
7 increase. I don't know how much it was.

8 Q. Where did you get that information from?

9 A. From Garfield Spence. Garfield handed it to  
10 us to give out.

11 Q. What was the reason Mr. Millan got an 18  
12 percent increase?

13 Which year was that, by the way?

14 A. 2003. You can tell by his review.

15 Q. Was it based on his review?

16 A. I would think so, yes.

17 Q. But you don't know?

18 A. I put the review in, and Gary assumed --  
19 handled the money.

20 Q. Mr. Millan never did computer programming  
21 when he reported to you, did he?

22 A. Not that I am aware of.

23 Q. He wasn't a software engineer, was he?

24 A. Not that I know of.

25 Q. He wasn't working for you as a software

1 engineer?

2 A. (Witness shakes head.)

3 Q. Was he a computer systems analyst?

4 A. I don't know.

5 Q. Was he involved when he worked for you in the  
6 application of system analysis techniques?

7 A. No.

8 Q. Did he ever have to determine system  
9 functional specifications?

10 A. No.

11 Q. He didn't design computer systems or  
12 programs, did he?

13 MS. BOUCHARD: Objection, other than  
14 the designs he already talked about?

15 A. I don't know.

16 MS. WALSH: I am asking him  
17 specifically.

18 Q. You don't know?

19 A. I don't know.

20 MS. BOUCHARD: Do you not know what  
21 she's talking about? He just said, he doesn't know  
22 what that is.

23 A. It sounds like engineering to me. It doesn't  
24 sound like anything he did for me.

25 Q. For you did he ever design the specifications

1 for the operations of the systems in CTI?

2 A. No.

3 Q. One of his functions that he performed when  
4 he reported to you is installing network applications,  
5 networks and hardware?

6 A. Not applications, no.

7 Q. Not applications?

8 A. No.

9 Q. Configuring networks and hardware?

10 A. At times, yes.

11 Q. Testing networks and hardware?

12 A. I believe that's more of the lab  
13 functionalities that may be referenced there.

14 Q. Did he ever have anything to do with  
15 applications?

16 A. Vending? Sorry.

17 Q. Did he have anything to do with applications?

18 A. No.

19 Q. Trouble shooting, he was involved in trouble  
20 shooting networks and hardware?

21 A. Yes. But again, I think that pertains to  
22 lab.

23 MS. WALSH: I don't have any other  
24 questions.

25 \* \* \*

1 EXAMINATION

2 BY MS. BOUCHARD:

3 Q. I have a few questions for you.

4 Did you ever talk to Gary about  
5 having him consider giving Mr. Millan more money based  
6 on the work he was doing for you in 2003?

7 A. Yes.

8 Q. And can you just explain what you remember  
9 telling him?

10 A. Basically everything in his review, he went  
11 above and beyond in a lot of areas. He helped with  
12 the compliance duties. He was network savvy. He  
13 helped with any network issues that arose, you know.  
14 He probably would be the first guy to contact from my  
15 team to get involved in something that was technical.

16 Q. Did anyone else on your team get an 18  
17 percent bonus?

18 MS. WALSH: Raise.

19 MS. BOUCHARD: Raise. Thanks.

20 A. No.

21 Q. Now, what would happen if a person on your  
22 team made a mistake and did not establish connectivity  
23 in the correct way, what would be the consequences to  
24 the business?

25 A. It would be critical to the business.

1 Q. Can you give me some examples of what could  
2 happen?

3 A. If you go into a data center and you put a  
4 device on the network and you don't know what you are  
5 doing, you could get a duplicate IP -- you could  
6 duplicate an IP address on a device and it could take  
7 a production device down, so you need to understand  
8 what you are doing before you put anything on the  
9 network.

10 Q. Could it impact a trader or trader's  
11 abilities to transact business on the trading floor?

12 A. Yes.

13 Q. Did you instruct your team about the  
14 consequences of their actions?

15 A. Yes.

16 Q. Because the consequences could be so high,  
17 how does that relate to documentation?

18 MS. WALSH: Objection to the form.

19 A. Documentation is critical.

20 Q. Can you explain why?

21 A. Because within the data center you have  
22 multiple paths on one connection, multiple  
23 interconnect points, and as you build a room and a  
24 data center, as it grows your cable and infrastructure  
25 gets very, very packed, packed meaning big, bundles of

1 cable.

2 If you don't have documentation and  
3 something does break, you know, you are going to be  
4 driving yourself crazy to find that connection. If  
5 you have it, if you have the database in front of you,  
6 you can run to the end points and pretty much match up  
7 the cable ID's that are on, and that will help you  
8 troubleshoot the link much quicker than if you didn't  
9 have documentation.

10 MS. BOUCHARD: I think that's it.

11 \* \* \*

12 RE-EXAMINATION

13 MS. WALSH:

14 Q. One follow-up question. You said that nobody  
15 else in the group got as high a raise as Mr. Millan in  
16 2003.

17 Do you know what raises the other  
18 technicians got in the group, if anything?

19 A. I don't think anything was higher than 18.

20 Q. Do you know what the others got?

21 A. Off the top of my head, no, I don't.

22 Q. Did you make any efforts to find that out?

23 A. No.

24 \* \* \*

25 RE-EXAMINATION

1 BY MS. BOUCHARD:

2 Q. You previously testified, Tom, that you were  
3 responsible for telling Mr. Millan what he got, right?

4 A. Yes.

5 Q. Gary made the ultimate decision, but you are  
6 the one who communicated it?

7 A. Yes.

8 Q. Did you communicate what the other people got  
9 on your team to them, too?

10 A. To each of them?

11 Q. Yes.

12 A. Yes.

13 (Deposition concluded.)

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\_\_\_\_\_, 2008

I hereby certify that the evidence  
and proceedings are contained fully and accurately in  
the notes taken by me of the testimony of the within  
witness who was duly sworn by me, and that this is a  
correct transcript of the same.

*Sally Slifer*

Sally A. Slifer, RMR, CRR, CSR  
Registered Merit Reporter  
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THOMAS SARANELLO

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## ERRATA SHEET

[illegible]

THOMAS SARANELLO

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2008

I hereby certify that I have read  
  
the foregoing transcript of my testimony taken at the  
  
within deposition and find it to be true and correct.

THOMAS G. SARANELLO